REMARKS

Claims 65-77 are pending. Claims 78-85 are new. Claims 65-77 stand rejected under 35 USC § 103(a) as being unpatentable over USP 5,744,578 to Duh. For the reasons which follow, Applicants submit that the claims are patentable over Duh. The claims are patentable because Duh does not disclose a *flow* of solid pellets, or directing the flow *through* a pipe. For sake of further clarity, however, Applicants have amended claim 1 to further call out the continuous nature of the process, although the continuous nature was already called out in the claim by virtue term "flow" and directing said flow "through" the pipe. Support for the word "continuous" may be found on page 25, line 5 and on line 20.

Duh does not disclose flowing solid polyester pellets, or flowing them through a pipe. Example 1 in columns 7 and 8 are directed to employing a short pipe as a crystallization vessel in which both ends of the pipe were capped. Solid polyester polymer and water were charged into the pipe, and the pipe was fitted with a thermocouple, pressure gauge, and a needle valve. The pipe was sealed in order to build the necessary pressure upon heating, with the valve being used to relieve pressure or pressurize the pipe crystallizer with compressed air as needed. The pipe containing water and pellets was placed into a DEG bath and heated for a time sufficient to obtain a desired crystallinity. Once crystallization was complete, the crystallizer was removed from the DEG bath, quenched in cold water, and opened up in order to release the contents inside the pipe. Thus, it is clear that there could be no flow of pellets within the pipe, nor could the pellets flow through the pipe. Rather, the pellets were contained within the pipe instead of flowing through the pipe.

Duh also does not suggest to those of ordinary skill to employ a process in which the pellets are flowing through a pipe. The only suggestion Duh provides when it comes to a continuous process is to employ a fluidized bed or an agitated vessel. See column 4, lines 14-21. Neither of these processes suggest flowing and crystallizing pellets in and through a pipe.

Since claim 65, and all claims dependent thereon call for a *flow* polyester pellets *through* a pipe, and Duh only suggests using a fluidized bed or an agitated vessel in a continuous process, withdrawal of the rejection is respectfully requested.

With respect to claim 82, Duh does not suggest the features of crystallizing at a temperature of 140° C to 180° C at a residence time ranging from 0 minutes to 4 minutes. Instead, Duh teaches that crystallization residence time will take from 5 minutes to 30 minutes. Column 4, lines 14-20 and column 5, lines 30-32.

Further, Duh is not directed to the crystallization of polyethylene terephthlate pellets as called for in the newly introduced claim 80. In fact, Duh distinguishes PEN pellets from PET pellets in noting that with PET pellets, pre-treatment is not necessary and instead they are charged into a crystallizer in which a transfer medium such as hot air, nitrogen, or indirect hot oil contact maintains a suitable crystallization temperature, and under such conditions, PET pellets can be crystallized without lumping or glomeration. Column 2, lines 14-21. Duh then goes on to distinguish PEN pellets by noting that PEN pellets undergo sudden and rapid expansion as they are heated near the crystallization temperature, and again contrasts PET by stating that "PET and PEN behave differently during crystallization as a result of their different physical and chemical properties." Column 1, lines 60-64.

For these reasons, Applicants respectfully request withdrawal of the rejection of claims 65-77 over Duh.

The Examiner is invited to contact the undersigned with any further questions related to the prosecution of this application.

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10/3/2006
Date